

**United States Bankruptcy Court
Middle District of Pennsylvania**

In re:

Wesley Matthew Kunkel,

Debtor.

Case No. 1:23-bk-01205-HWV

Chapter 13

Related to ECF No. 27

**Debtor's Objection to Motion for Relief from Stay filed by US Bank Trust
National Association**

AND NOW, Debtor Wesley Matthew Kunkel, by and through his attorney, hereby objects to the Motion for Relief from Stay filed by US Bank Trust National Association. Because the purported arrearage that gave rise to the Motion can be timely paid directly or through the chapter 13 plan, no grounds for relief exist and the Motion must be denied.

NOW, THEREFORE, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in his favor as may be necessary and proper under the law.

Date: January 22, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
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Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by US Bank Trust National Association to be served on all parties on the clerk's service list through the CM/ECF system.

Date: January 22, 2024

/s/ Michael A. Cibik
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Wesley Matthew Kunkel,

Debtor.

Case No. 1:23-bk-01205-HWV

Chapter 13

Related to ECF No. 27

**Order Denying Motion for Relief from Stay filed by US Bank Trust National
Association**

AND NOW, upon consideration of the Motion for Relief from Stay filed by US Bank Trust National Association, and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.